BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE GEORFTARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD (UPS/USPS-T4-12 through 13) (April 4, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves these follow-up interrogatories directed to United States Postal Service witness Pafford: UPS/USPS-T4-12 through 13.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe L.L.P. 3400 Two Logan Square 18th & Arch Streets Philadelphia, PA 19103-2762 (215) 656-3310 (215) 656-3301 (FAX) and

1200 Nineteenth Street, NW Washington, DC 20036-2430 (202) 861-3900

Of Counsel.

FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD

UPS/USPS-T4-12. Interrogatory UPS/USPS-T5-29 asked Mr. Hunter, among other things, to provide with respect to Tables 1-3 in his testimony (which include total estimates for Parcel Post, *i.e.*, combining DRPW and BRPW data) estimates of FY1998 Parcel Post revenue, pieces, and weight broken out by inter-BMC, intra-BMC, and DBMC. Mr. Hunter's response deals solely with BRPW results.

- (a) Provide for that portion of the total estimates of Parcel Post revenue, pieces, and weight for FY1998 that comes from the DRPW system a breakout of Parcel Post revenue, pieces, and weight by inter-BMC, intra-BMC, and DBMC.
- (b) Provide for the total FY1998 estimates of Parcel Post revenue, pieces, and weight a breakout of those estimates by inter-BMC, intra-BMC, and DBMC.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

William J. Pinamont

Attorney for United Parcel Service

Dated: April 4, 2000 Philadelphia, Pa.

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